

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

In re: Joint Petition for Purchase and Sale of Assets :
By the Narragansett Electric Company and : **Docket No. D-06-13**
the Southern Union Company :

MOTION OF UNITED STEELWORKERS, LOCAL 13421,
FOR LEAVE TO INTERVENE

Now comes the United Steelworkers Local 12431 (“Union”) and moves pursuant to Rule 17 of Division of Public Utilities and Carriers’ Rules of Practice and Procedure for leave to intervene in the above-referenced docket.

In support of its Motion, the Union states it is the certified collective bargaining representative of certain employees of the Southern Union Company (“Company”). There presently exist two collective bargaining agreements between the Company and the Union. The first, which expires on May 28, 2007, governs the terms and conditions of employment for the “production plant, distribution department, meter readers, customer service, and main office building maintenance employees... .” The second contract’s term runs to July 31, 2007. That second agreement encompasses “non-exempt office clerical employees” of the Company.

The Joint Petition contemplates substantial changes to the wages, hours and working conditions for members of the Union. The testimony submitted in support of that petition by the Company indicates that the Company anticipates large scale restructuring, including the elimination of jobs. For example, the testimony of Ronald T. Gerwatowski states in relevant part “by consolidating operations we can reduce costs and produce synergies savings and efficiency gains in operating expenses. These savings

will occur in metering, billing and customer service. For example, both Narragansett and New England Gas have automated meter reading. After any necessary modifications are made to the metering technologies, we will be able to read both gas and electric meters with a single pass to read both meters rather than have two independent meter reading groups.”

Action of the Division on the pending docket will invariably affect the rights and responsibilities of the Union and the Company under the existing collective bargaining agreements. Accordingly, it is necessary for the Movant to be allowed to intervene to cross-examine witnesses and to present argument and testimony in support of its position. The Union’s status as the representative of those frontline employees who deal with safety and customer services issues on a day to day basis places it in a unique position to bring evidence relative to such issues to the Division’s attention. Furthermore, granting of this Motion would not prejudice any party.

WHEREFORE, the United Steelworkers of America, Local 12341, respectfully requests leave to intervene in these proceedings and to participate by filing testimony, by the conduct of cross-examination and the presentation of argument.

Respectfully submitted,
United Steelworkers of America
Local Union 12431
By its attorneys,

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CERTIFICATION

I hereby certify that I mailed a true copy of the within document, postage prepaid, this _____ day of April, 2006, to the following:

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